

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

DON GIBSON, LAUREN CRISS, and)	
JOHN MEINERS, and DANIEL UMPA,)	
individually and on behalf of all others)	
similarly situated,)	
)	Case No. 4:23-cv-00788-SRB
Plaintiffs,)	[Consolidated with 4:23-cv-00945-SRB]
)	
v.)	Judge Stephen R. Bough
)	
NATIONAL ASSOCIATION OF)	
REALTORS, <i>et al.</i> ,)	
)	
Defendants.)	

**NOTICE OF PENDING SETTLEMENT AND JOINT MOTION TO STAY CASE AS TO
JOHN L. SCOTT REAL ESTATE AFFILIATES, INC., AND JOHN L. SCOTT, INC.**

Plaintiffs Don Gibson, Lauren Criss, John Meiners, and Daniel Umpa (collectively “Plaintiffs”), and defendants John L. Scott Real Estate Affiliates, Inc., and John L. Scott, Inc. (“John L. Scott”) (and together with Plaintiffs, the “Parties”) respectfully provide notice to the Court that Plaintiffs have reached an agreement with John L. Scott to settle all claims asserted against them in the above-captioned consolidated action as part of a proposed nationwide class settlement. The settlement was jointly negotiated with counsel for all Plaintiffs. This agreement is subject to the Court’s approval under Federal Rule of Civil Procedure 23. Consistent with the Parties’ agreement, Plaintiffs will promptly file a motion in this Court for preliminary approval of the proposed settlement.

As provided by the agreement, the Parties hereby jointly stipulate and request that the Court stay all deadlines and proceedings solely as to John L. Scott to preserve the resources of Plaintiffs, John L. Scott, and the Court, and to seek preliminary and final approval of the settlement.

Dated: October 2, 2024

Respectfully submitted by:

/s/ Steve W. Berman

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***Attorneys Specially Appearing for
Defendants John L. Scott, Inc., and John L.
Scott Real Estate Affiliates, Inc.***

CERTIFICATE OF SERVICE

I hereby certify that on October 2, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to counsel of record for this case.

/s/ Steve W. Berman
STEVE W. BERMAN

Attorney for Plaintiffs